

OCT 29 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

| | | |
|------------------------------------------------------|---|---------------------------------------|
| In the Matter of |) | |
| |) | |
| Amendment of Section 73.202(b), |) | MM Docket No. 01-229, 01-230, 01-231, |
| FM Table of Allotments, |) | 01-232, 01-257 |
| FM Broadcast Stations. |) | RM-10257, RM-10258, RM-10259, |
| |) | RM-10260, RM-10267 |
| (Caseville, Deckerville, Harbor Beach, Port Sanilac, |) | |
| Bad Axe, and Lexington Michigan |) | |

COMMENTS AND COUNTERPROPOSALS

To: Chief, Allocations Branch

Edward Czelada, ("Czelada"), herein submits Comments and Counterproposals in the above captioned proceedings.

Charles Crawford ("Crawford") has proposed the allotment of 289A to Caseville, 297A to Deckerville, 256A to Harbor Beach, 225A to Port Sanilac and 231A in Bad Axe. In response to Crawford's petition, the Commission released two Notices of Proposed Rulemakings ("NPRM's") on September 7, 2001 and on September 28, 2001. Both proceedings will be addressed in this document because channel substitutions are mutual exclusive. The Comments and Counterproposals are timely filed in both NPRM's.

We believe the allocation of five new channels in the Huron County area by Crawford is an Abuse of Commission Processes. This could be an attempt to lower the bidding price during the subsequent auctions by dividing the finances and attention of potential bidders. Additionally, the Commission should require Crawford to demonstrate that he is financially qualified to build the outlandish number of stations that he has recently requested in rulemakings throughout the country. Huron County is lightly populated

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agricultural area that is unlikely to be able to financially support that many new commercial FM stations. If Huron County area is "flooded" with five new FM signals it could also cause severe financial distress on existing licensees², which could actually cause a decrease in public in service by the existing stations due to budget cuts or bankruptcy. The Commission should evaluate whether the allocation of several new frequencies to the Huron County area would serve the public interest, convenience and necessity.

We counterpropose the allotment of 256A to Lexington, Michigan³ as a second local service. Lexington Michigan⁴ is an incorporated village that already has been deemed acceptable size for allocation purposes. Because of the scarcity of Non-commercial spectrum in the Lexington area we respectfully request that 256A be reserved for non-commercial use at Lexington, as it will provide first and second non-commercial service to the surrounding areas. The attached engineering report demonstrates that the counterproposal meets all spacing and community coverage requirements, as well as, the need for the channel to be reserved for non-commercial use. If it determined that 256A at Lexington is not acceptable for non-commercial use then we respectfully request that it be allocated for commercial purposes. We will apply for 256A at Lexington and build it promptly once it is authorized.

We counterpropose of allotment of 289A at Harbor Beach, Michigan⁵ in lieu of 256A. Channel 256A is being counterproposed for Lexington (See Above). The attached engineering report demonstrates that the counterproposal meets all spacing and community coverage requirements.

¹ Lexington has been added to the caption.

² WLEW-FM is the only FM station is currently licensed in Huron County.

³ The proposed special reference point for the Lexington allotment is N 43-22-30, W 82 32-04

⁴ WBTI on channel 245A is currently licensed to Lexington.

⁵ The proposed special reference point for the Harbor Beach allotment is N 43-50-41, W 82 39-05.

We counterpropose of allotment of 231A at Deckerville, Michigan⁶ in lieu of 297A. Channel 297C3 is currently tied-up in a MM Docket 01-33 (RM-10060) as a counterproposal for 221C3 for Cass City. A petition for reconsideration has been filed on the grounds the Commission did not properly consider 307(b). If the Commission ultimately denies the allocation of 297C3 for Cass City then we would like to request that 297C3 be reserved for non-commercial use at Ubly, Michigan⁷. Due to the uncertainty associated with the petition for reconsideration, and associated appeals, it is advised that channel 297 not be used in the Crawford proceedings. The attached engineering report demonstrates that the counterproposal meets all spacing and community coverage requirements.

We counterpropose of allotment of 275A at Bad Axe, Michigan⁸ in lieu of 231A. Channel 231A is being counterproposed for Deckerville (See Above). The attached engineering report demonstrates that the counterproposal meets all spacing and community coverage requirements.

We counterpropose of allotment of 267A at Caseville, Michigan⁹ in lieu of 289A. Channel 289A is being counterproposed for Harbor Beach (See Above). The attached engineering report demonstrates that the counterproposal meets all spacing and community coverage requirements.

WHEREFORE, in light of all circumstances present, we respectfully request that the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, for the communities listed below, to be amended as follows:

⁶ The proposed reference point for the Deckerville allotment is N 43-31-36, W 82-44-07 and doesn't require a site restriction. (Deckerville Community Coordinates)

⁷ The proposed special reference point for the Ubly/Cass City allotment is N 43-42-00, W 83-55-30.

⁸ The proposed special reference point for the Bad Axe allotment is N 43-48-12, W 83-00-00.

| <u>Community</u> | <u>Present</u> | <u>Proposed</u> |
|------------------------|----------------|-----------------|
| Deckerville, Michigan | -- | 231A |
| Harbor Beach, Michigan | 279C2 | 279C2, 289A |
| Bad Axe, Michigan | 271C2 | 271C2, 275A |
| Caseville, Michigan | -- | 267A |
| Port Sanilac | -- | 225A |
| Lexington, Michigan | 245A | 245A, *256A |

The undersigned hereby verifies that this document and previous related pleadings, pursuant to §1.52 of the Commission's rules, is true and correct to the best of my knowledge and belief.

Respectfully submitted,

By: Edward T. Czelada

Edward T. Czelada

3302. N. Van Dyke

Imlay City, MI 48444

(810) 724 2638

Oct 29, 2001

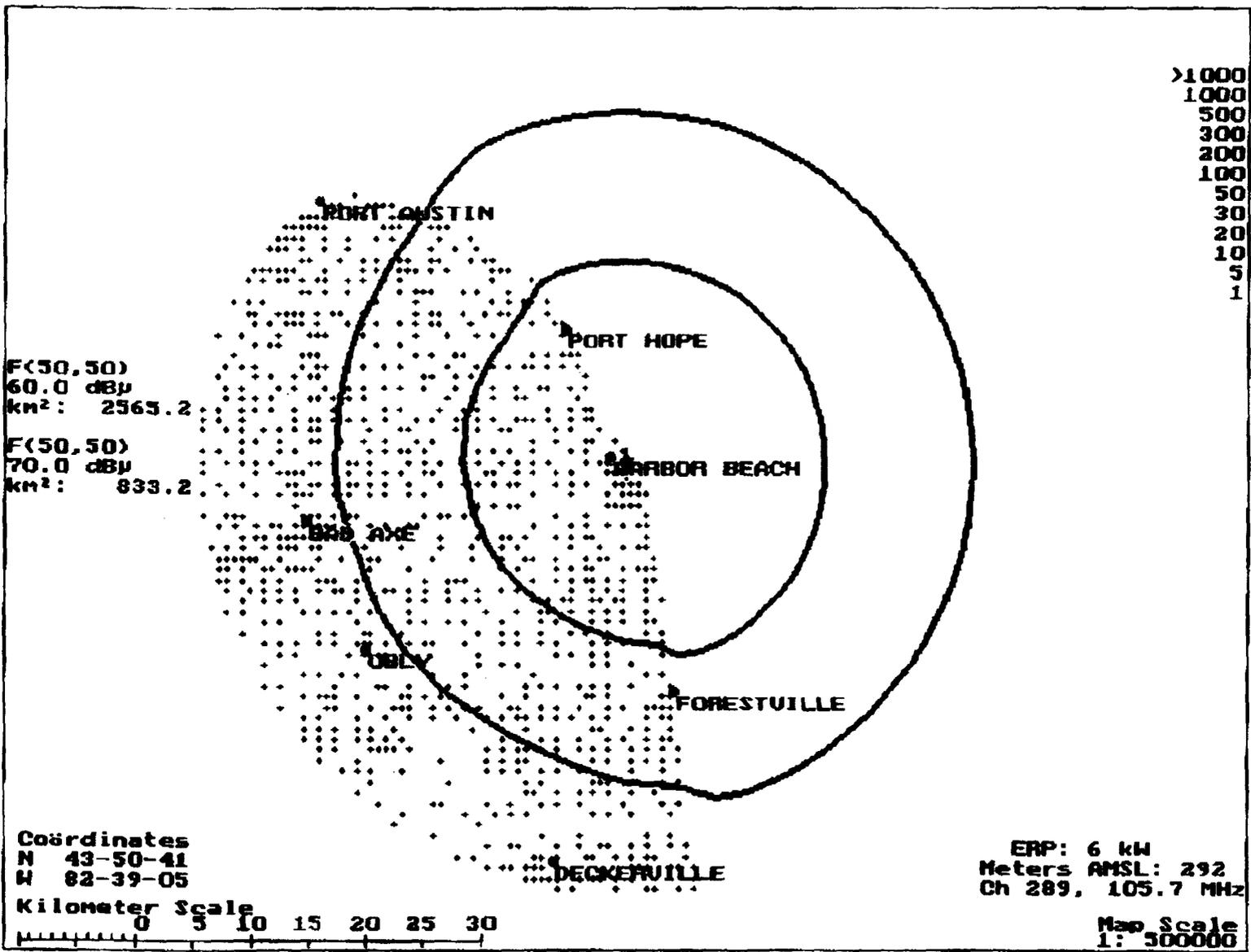
⁹ The proposed special reference point for the Caseville allotment is N 43-56-28, W 83-16-17.

*HARBOR BEACH COUNTELL -
PROPOSAL*

MAPFM search of channel 289A6 (105.7 MHz), at N. 43 50 41, W. 82 39 5.

Searching Channel 289A6 (105.7 MHz):

| CALL | CITY | ST | CHN | CL | S | DIST | SEPN | BRNG | CLEARANCE |
|--------|---------------|----|-----|----|---|-------|-------|--------|-----------|
| CFCAFM | Kitchener | ON | 287 | C1 | | 170.0 | 106.0 | 106.7° | 64.0 |
| ALC | Meaford | ON | 288 | A | | 181.4 | 113.0 | 60.8° | 68.4 |
| WWCKFM | Flint | MI | 288 | B1 | L | 123.0 | 96.0 | 221.1° | 27.0 |
| WBMI | West Branch | MI | 288 | A | L | 138.9 | 72.0 | 291.3° | 66.9 |
| ALC | Flint | MI | 288 | B1 | U | 123.9 | 96.0 | 222.4° | 27.9 |
| ALC | Chatham | ON | 288 | A | | 165.0 | 113.0 | 166.6° | 52.0 |
| ALC | West Branch | MI | 288 | A | U | 138.9 | 72.0 | 291.3° | 66.9 |
| CHREFM | St Catharines | ON | 289 | B | | 291.4 | 223.0 | 106.6° | 68.4 |
| ALC | Detroit | MI | 290 | B | U | 159.0 | 113.0 | 196.3° | 46.0 |
| WDTJ | Detroit | MI | 290 | B | L | 159.0 | 113.0 | 196.3° | 46.0 |
| WHST | Tawas City | MI | 291 | C3 | L | 94.1 | 42.0 | 300.4° | 52.1 |
| ALC | Tawas City | MI | 291 | C3 | U | 94.1 | 42.0 | 300.4° | 52.1 |
| ALC | Sarnia | ON | 292 | B | | 107.0 | 71.0 | 166.3° | 36.0 |
| ALC | Sarnia | ON | 292 | B | | 110.4 | 71.0 | 169.1° | 39.4 |
| NEW | Sarnia | ON | 292 | B | | 110.4 | 71.0 | 169.1° | 39.4 |



*BAD AXE COUNTER
PROPOSAL*

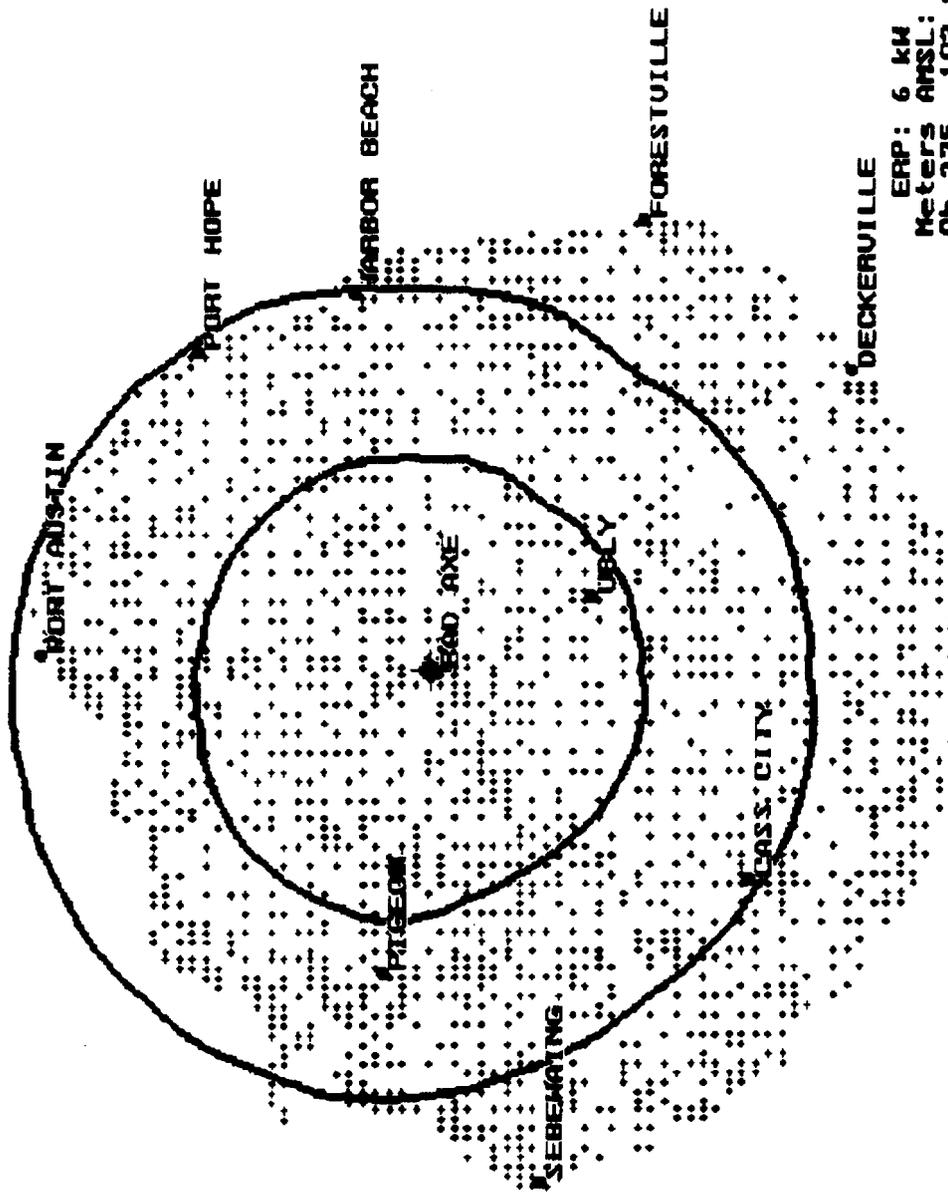
MAPFM search of channel 275A6 (102.9 MHz), at N. 43 48 12, W. 83 0 0.

Searching Channel 275A6 (102.9 MHz):

| CALL | CITY | ST | CHN | CL | S | DIST | SEPN | BRNG | CLEARANCE |
|--------|---------------|----|-----|----|---|-------|-------|--------|-----------|
| WIDL | Caro | MI | 221 | A | L | 45.2 | 10.0 | 217.6° | 35.2 |
| ALC | Caro | MI | 221 | A | U | 45.2 | 10.0 | 217.6° | 35.2 |
| WGRT | Port Huron | MI | 272 | A | L | 91.8 | 31.0 | 152.7° | 60.8 |
| ALC | Port Huron | MI | 272 | A | U | 91.8 | 31.0 | 152.7° | 60.8 |
| ALC | Bay City | MI | 273 | B | U | 77.4 | 69.0 | 241.7° | 8.4 |
| WIOG | Bay City | MI | 273 | B | L | 77.4 | 69.0 | 241.7° | 8.4 |
| WIOG | Bay City | MI | 273 | B | L | 77.4 | 69.0 | 241.7° | 8.4 |
| ALC | Mount Clemens | MI | 274 | B | U | 140.1 | 113.0 | 176.8° | 27.1 |
| ALC | Owen Sound | ON | 274 | C1 | | 197.3 | 181.0 | 58.0° | 16.3 |
| WDMK | Mount Clemens | MI | 274 | B | L | 140.1 | 113.0 | 176.8° | 27.1 |
| ALC | Grand Rapids | MI | 275 | B | U | 238.2 | 178.0 | 246.7° | 60.2 |
| WMKC | St. Ignace | MI | 275 | C | L | 248.1 | 226.0 | 319.6° | 22.1 |
| CKLHFM | Hamilton | ON | 275 | B | | 258.2 | 223.0 | 101.6° | 35.2 |
| WFURFM | Grand Rapids | MI | 275 | B | L | 238.2 | 178.0 | 246.7° | 60.2 |
| ALC | St. Ignace | MI | 275 | C | U | 269.5 | 226.0 | 328.4° | 43.5 |
| ALC | Ann Arbor | MI | 275 | B | U | 180.2 | 178.0 | 199.2° | 2.2 |
| WIQBFM | Ann Arbor | MI | 275 | B | L | 184.6 | 178.0 | 200.9° | 6.6 |
| ALC | Lapeer | MI | 276 | A | U | 81.8 | 72.0 | 190.9° | 9.8 |
| ALC | St. Thomas | ON | 276 | B | | 184.0 | 149.0 | 125.3° | 35.0 |
| ALC | Gladwin | MI | 276 | C3 | U | 122.4 | 89.0 | 277.7° | 33.4 |
| ALC | St. Thomas | ON | 276 | B | | 184.0 | 149.0 | 125.3° | 35.0 |
| WGDNFM | Gladwin | MI | 276 | C3 | L | 125.6 | 89.0 | 277.7° | 36.6 |
| CBEF1F | Leamington | ON | 276 | A | | 189.8 | 113.0 | 171.7° | 76.8 |
| WRXF | Lapeer | MI | 276 | A | L | 81.8 | 72.0 | 190.9° | 9.8 |
| ALC | Tawas City | MI | 277 | C3 | U | 75.8 | 42.0 | 329.7° | 33.8 |
| WQLB | Tawas City | MI | 277 | C3 | L | 84.0 | 42.0 | 323.8° | 42.0 |
| WIDL | CASS CITY | MI | 221 | C3 | A | 21.6 | 11.0 | | 10.6 |

BAD AXE

>1000
 1000
 500
 300
 200
 100
 50
 30
 20
 10
 5
 1



F(50,50)
 60.0 dBm
 km²: 2557.6

F(50,50)
 70.0 dBm
 km²: 811.5

Coordinates
 N 43-48-12
 W 83-00-00

ERP: 6 kW
 Meters AMSL: 323
 Ch 275, 102.9 MHz

Kilometer Scale
 0 5 10 15 20 25 30

Map Scale
 1: 500000

CASEVILLE COUNTER-
PROPOSAL

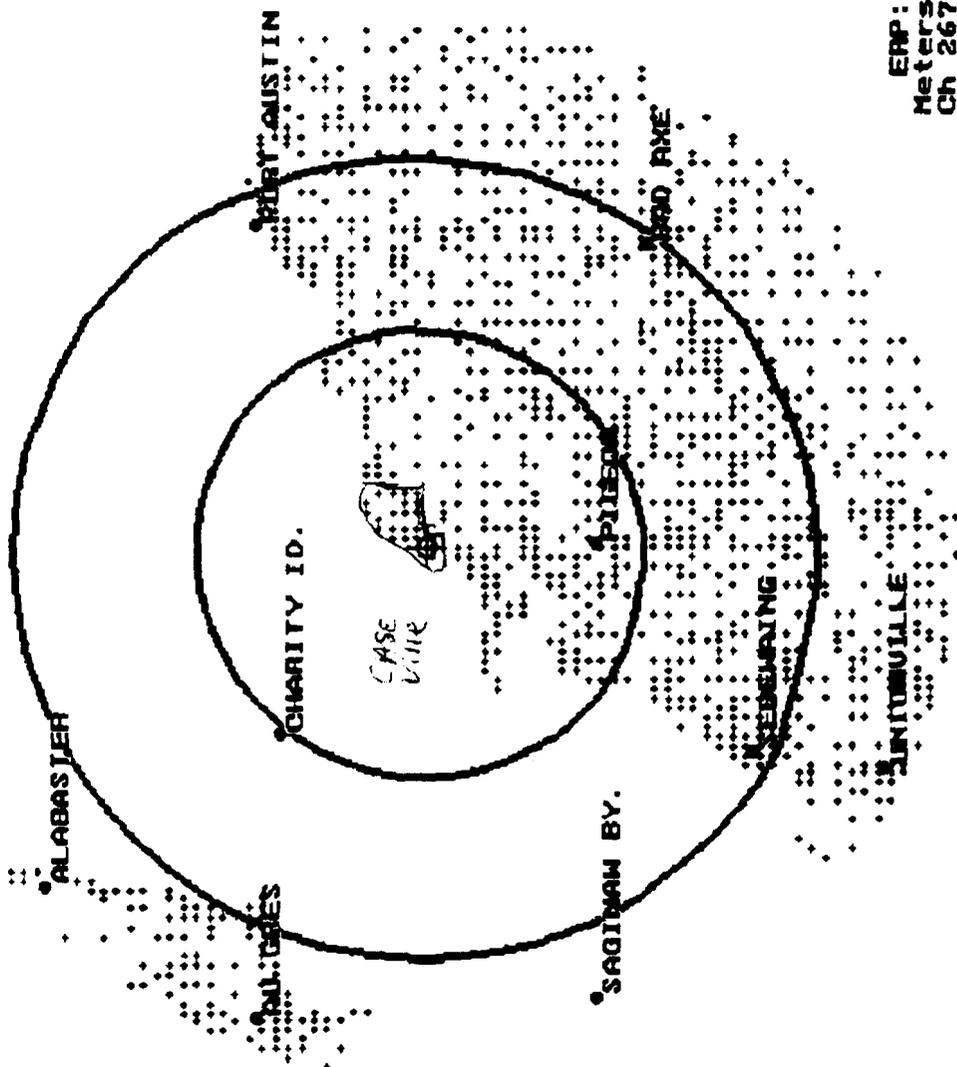
MAPFM search of channel 267A6 (101.3 MHz), at N. 43 56 28, W. 83 16 17.

Searching Channel 267A6 (101.3 MHz):

| CALL | CITY | ST | CHN | CL | S | DIST | SEPN | BRNG | CLEARANCE |
|--------|--------------|----|-----|----|---|-------|------------------|--------|------------------------------|
| WNER | Sandusky | MI | 214 | B1 | L | 59.1 | 12.0 | 155.0° | 47.1 |
| WCLS | Oscoda | MI | 264 | C3 | L | 71.3 | 42.0 | 353.2° | 29.3 |
| ALC | Oscoda | MI | 264 | C3 | U | 62.4 | 42.0 | 354.8° | 20.4 |
| ALC | Wingham | ON | 265 | B | | 157.1 | 84.0 | 92.3° | 73.1 |
| ALC | Goderich | ON | 265 | B | | 134.3 | 84.0 | 101.5° | 50.3 |
| ALC | Pinconning | MI | 265 | A | U | 66.8 | 31.0 | 260.9° | 35.8 |
| WYLZ | Pinconning | MI | 265 | A | L | 66.8 | 31.0 | 260.9° | 35.8 |
| ALC | Wingham | ON | 265 | B | | 157.1 | 84.0 | 92.3° | 73.1 |
| WQON | Roscommon | MI | 266 | A | L | 133.3 | 72.0 | 301.7° | 61.3 |
| ALC | Roscommon | MI | 266 | A | U | 122.1 | 72.0 | 300.5° | 50.1 |
| WRIF | Detroit | MI | 266 | B | L | 163.4 | 113.0 | 179.4° | 50.4 |
| WRIF | Detroit | MI | 266 | B | L | 165.5 | 113.0 | 177.0° | 52.5 |
| ALC | Detroit | MI | 266 | B | U | 163.4 | 113.0 | 179.4° | 50.4 |
| ALC | Grand Rapids | MI | 267 | B | U | 196.2 | 178.0 | 239.4° | 18.2 |
| CKOTFM | Tillsonburg | ON | 267 | B | | 222.4 | 223.0 | 117.6° | 0.6 210.0 12.4 ok |
| WCUZFM | Grand Rapids | MI | 267 | B | L | 196.2 | 178.0 | 239.4° | 18.2 |
| WWBN | Clio | MI | 268 | A | A | 85.1 | 72.0 | 207.7° | 13.1 |
| ALC | Sarnia | ON | 268 | A | | 128.8 | 113.0 | 146.7° | 15.8 |
| WWBN | Tuscola | MI | 268 | A | D | 77.1 | 72.0 | 194.2° | 5.1 |
| ALC | Tuscola | MI | 268 | A | U | 84.6 | 72.0 | 207.8° | 12.6 |
| WWBN | Tuscola | MI | 268 | A | L | 77.1 | 72.0 | 194.2° | 5.1 |
| CKNXFM | Wingham | ON | 269 | C1 | | 166.4 | 106.0 | 84.3° | 60.4 |
| ALC | Coleman | MI | 269 | A | U | 97.1 | 31.0 | 261.5° | 66.1 |
| ALC | Wingham | ON | 269 | C1 | | 166.4 | 106.0 | 84.3° | 60.4 |
| WPRJ | Coleman | MI | 269 | A | L | 97.1 | 31.0 | 261.5° | 66.1 |

CASEVILLE

>1000
 1000
 500
 300
 200
 100
 50
 30
 20
 10
 5
 1



ERP: 6 kW
 Meters AMSL: 280
 Ch 267, 101.3 MHz
 Map Scale
 1: 500000

F(50,50)
 60.0 dBm
 kmz: 2538.5
 F(50,50)
 70.0 dBm
 kmz: 785.6

Coordinates
 N 43-56-28
 W 83-16-17



DECKERVILLE COUNTER-COMMUNITY COORDS PROPOSAL

MAPFM search of channel 231A6 (94.1 MHz), at N. 43 31 36, W. 82 44 7.

Searching Channel 231A6 (94.1 MHz):

| CALL | CITY | ST | CHN | CL | S | DIST | SEPN | BRNG | CLEARANCE |
|--------|----------------|----|-----|----|---|-------|-------|--------|--------------------|
| CBCLFM | London | ON | 228 | C1 | | 128.8 | 92.0 | 119.5° | 36.8 |
| ALC | Frankenmuth | MI | 229 | A | U | 71.0 | 31.0 | 249.8° | 40.0 |
| NEW | Frankenmuth | MI | 229 | A | C | 71.6 | 31.0 | 252.9° | 40.6 |
| ALC | Mio | MI | 230 | C2 | U | 171.8 | 106.0 | 309.0° | 65.8 |
| CKLWFM | Windsor | ON | 230 | C1 | | 152.1 | 181.0 | 187.9° | 28.9 168.0 -15.9 ① |
| CBLFM | Toronto | ON | 231 | C1 | | 270.7 | 256.0 | 87.3° | 14.7 |
| ALC | Jackson | MI | 231 | B | U | 201.8 | 178.0 | 231.4° | 23.8 |
| WXIK | Jackson | MI | 231 | B | L | 201.8 | 178.0 | 231.4° | 23.8 |
| ALC | Little Current | ON | 231 | C1 | | 273.7 | 256.0 | 12.5° | 17.7 |
| NEW | Chatham | ON | 232 | B | | 131.4 | 149.0 | 157.0° | 17.6 137.0 -5.6 ② |
| ALC | Chatham | ON | 232 | B | | 133.0 | 149.0 | 160.2° | 16.0 137.0 -4.0 ② |
| ALC | Walkerton | ON | 233 | B | | 138.0 | 84.0 | 63.0° | 54.0 |
| WCENFM | Mount Pleasant | MI | 233 | C1 | L | 152.5 | 75.0 | 278.4° | 77.5 |
| ALC | Birmingham | MI | 234 | B | U | 124.2 | 69.0 | 196.3° | 55.2 |
| ALC | London | ON | 234 | A | | 132.4 | 54.0 | 116.7° | 78.4 |
| WCSX | Birmingham | MI | 234 | B | L | 124.2 | 69.0 | 196.3° | 55.2 |
| ALC | London | ON | 234 | B | | 131.7 | 71.0 | 115.9° | 60.7 |
| CHRWFM | London | ON | 234 | B | | 131.7 | 71.0 | 115.9° | 60.7 |
| WCSX | Birmingham | MI | 234 | B | L | 124.2 | 69.0 | 196.3° | 55.2 |
| ALC | Sarnia | ON | 284 | A | | 67.5 | 16.0 | 155.9° | 51.5 |
| ALC | Goderich | ON | 285 | A | | 85.9 | 16.0 | 73.2° | 69.9 |

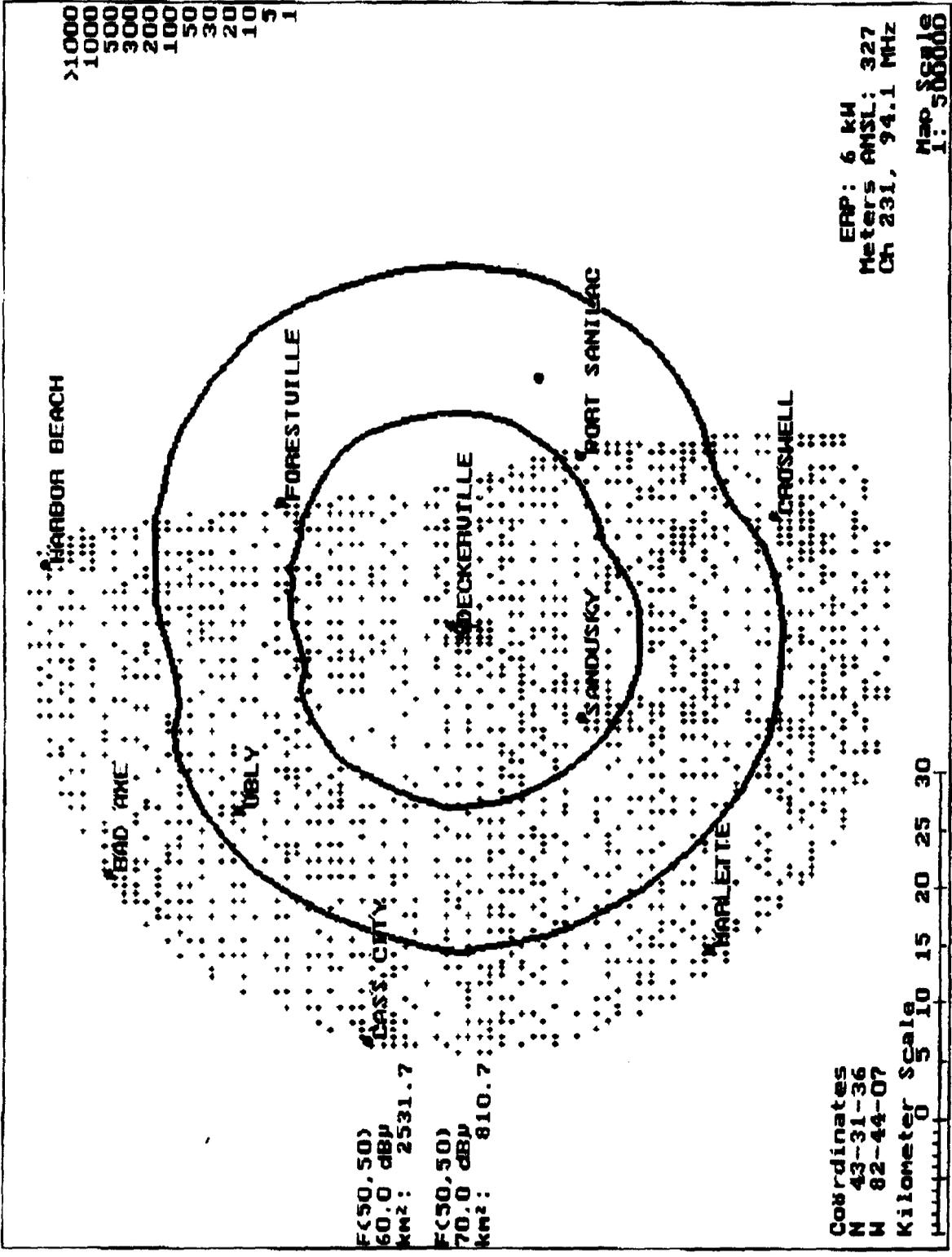
① MEETS US-CAN. SEE MAP

② MEETS US-CAN. SEE MAP

* NO SITE RESTRICTED NEED AT THESE COORD.

* TODBU MAP NOT NECESSARY SINCE COORD ARE IN CITY OF LICENSE.

Deckerville



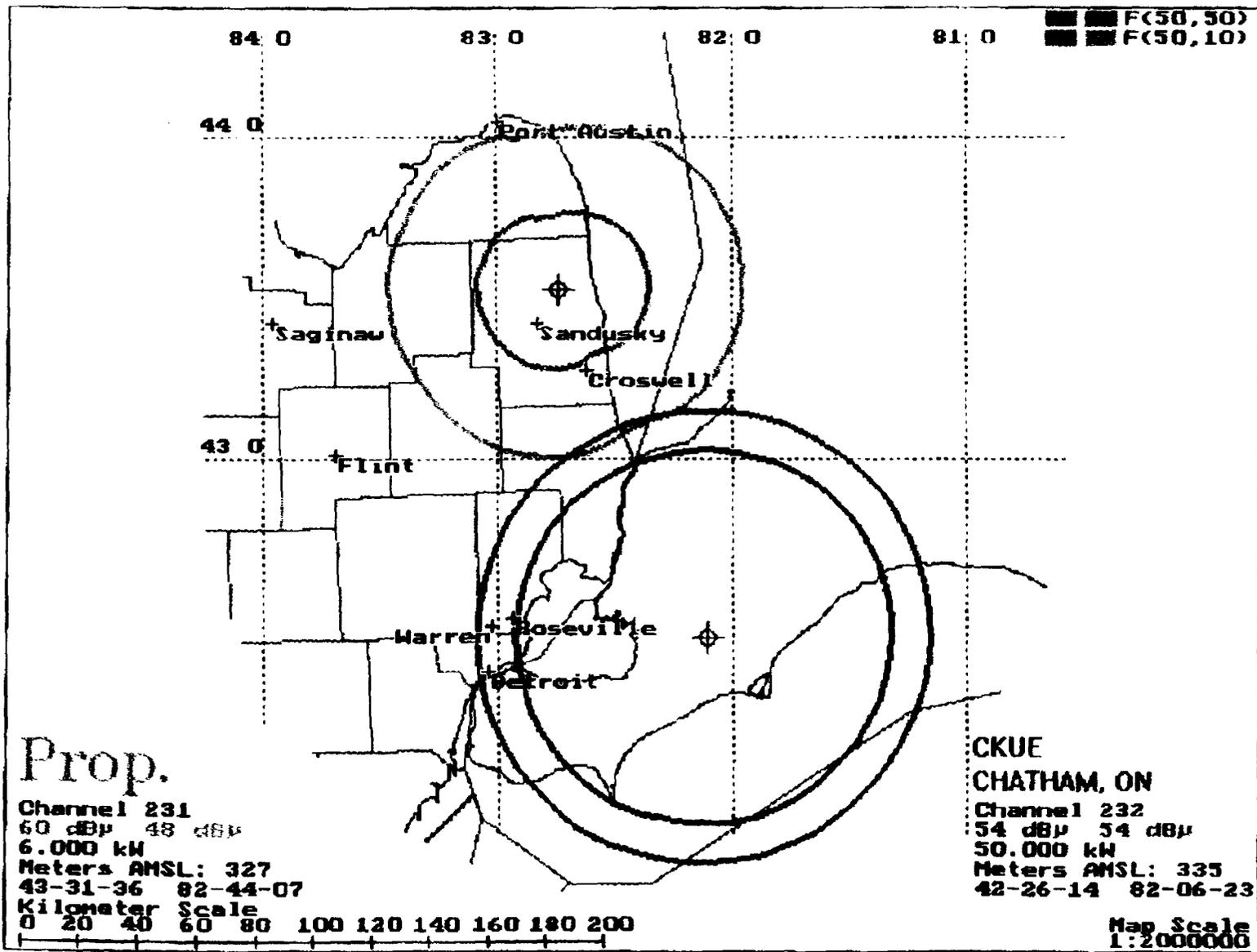
>1000
 1000
 500
 300
 200
 100
 50
 30
 10
 5
 1

ERP: 6 kW
 Meters AMSL: 327
 Ch 231, 94.1 MHz
 Map Scale
 1:50000

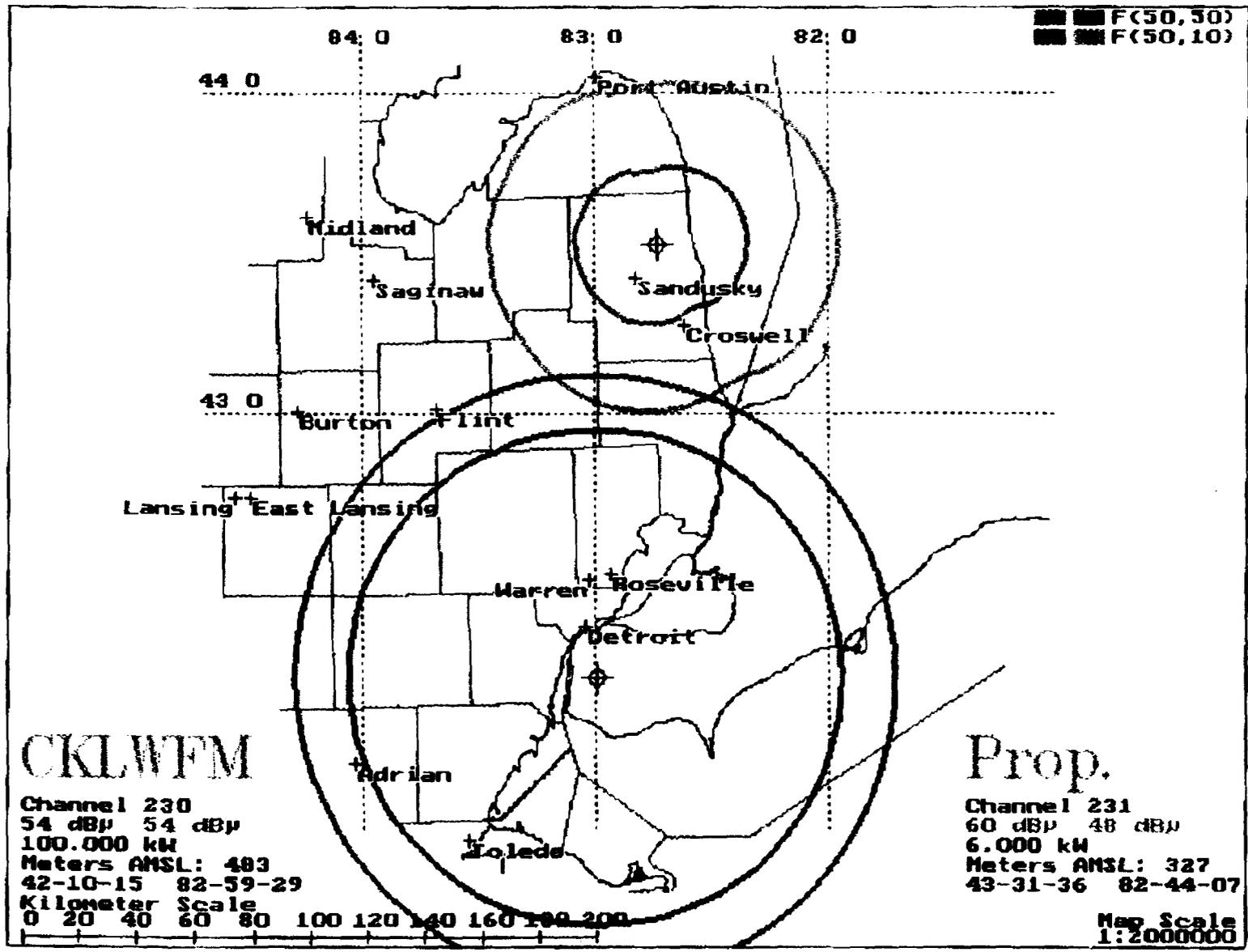
FC(50,50)
 60.0 dBm
 km2: 2531.7
 CLASS: CITY
 FC(50,50)
 70.0 dBm
 km2: 810.7

Coordinates
 N 43-31-36
 W 82-44-07
 Kilometer Scale
 0 5 10 15 20 25 30

Deckerville
MEETS US-CAN WORKING ARRANGEMENT



Peckeville ①
MEETS US-CAN WORKING ANNOUNCEMENT



LEXINGTON 256 A

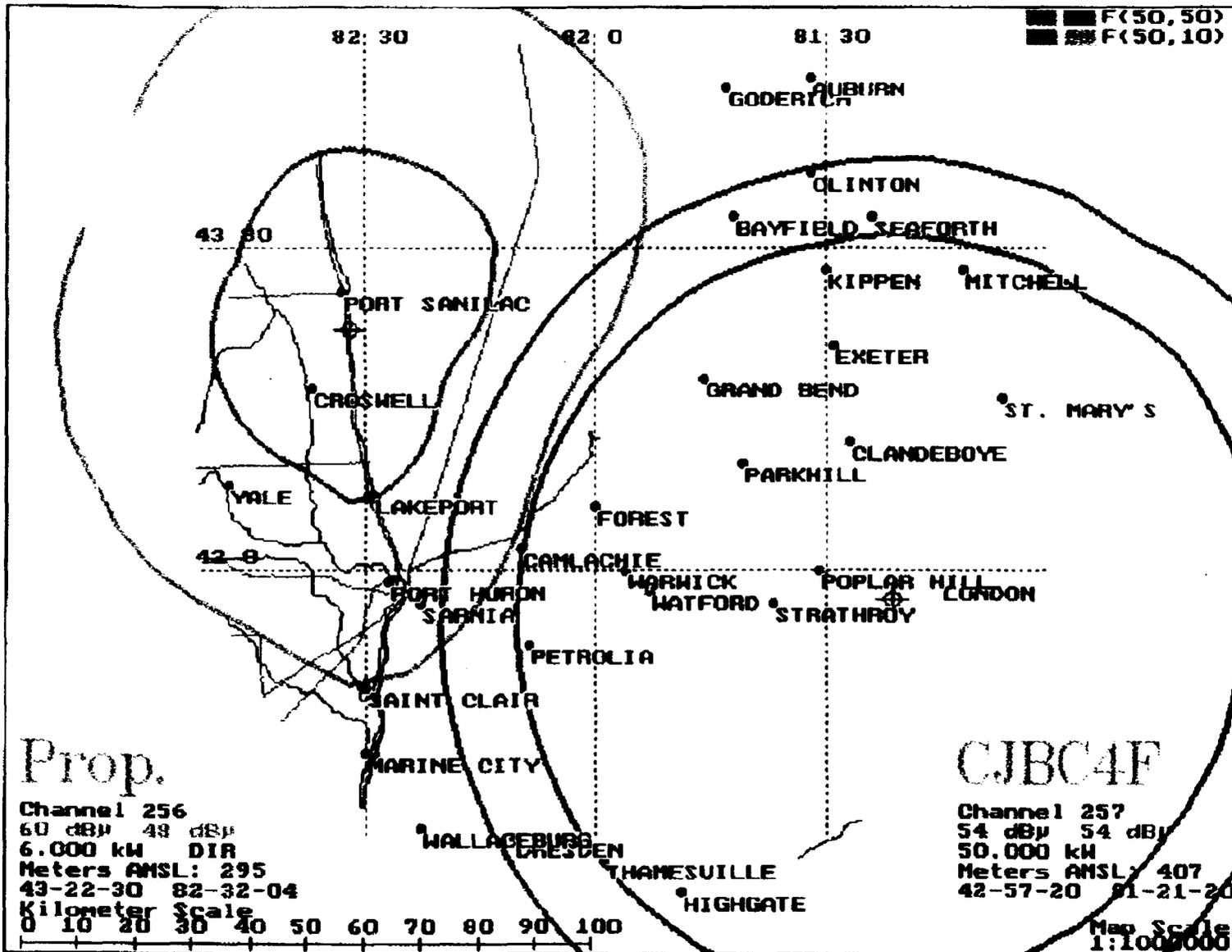
MADPM search of channel 256A6 (99.1 MHz), at N. 43 22 30, W. 82 32 4.

Searching Channel 256A6 (99.1 MHz):

| CALL | CITY | ST | CHN | CL | S | DIST | SEPN | BRNG | CLEARANCE |
|--------|--------------|----|-----|----|---|-------|-------|--------|-----------|
| WNFA | Port Huron | MI | 202 | A | L | 42.7 | 10.0 | 172.8° | 32.7 |
| NEW | Elkton | MI | 203 | C3 | A | 62.3 | 12.0 | 313.1° | 50.3 |
| NEW | Cass City | MI | 203 | C3 | A | 50.5 | 12.0 | 303.4° | 38.5 |
| W203AX | Caro | MI | 203 | D | C | 68.0 | 0.0 | 273.1° | 68.0 |
| NEW | Gagetown | MI | 203 | A | A | 62.3 | 10.0 | 313.1° | 52.3 |
| ALC | London | ON | 253 | B | | 106.6 | 71.0 | 115.9° | 35.6 |
| WVMV | Detroit | MI | 254 | B | L | 119.9 | 69.0 | 204.8° | 50.9 |
| ALC | Detroit | MI | 254 | B | U | 119.9 | 69.0 | 204.8° | 50.9 |
| ALC | Vassar | MI | 255 | A | U | 80.4 | 72.0 | 273.9° | 8.4 |
| ALC | Simcoe | ON | 255 | A | | 189.2 | 113.0 | 107.2° | 76.2 |
| WOWE | Vassar | MI | 255 | A | L | 79.5 | 72.0 | 263.9° | 7.5 |
| WFMK | East Lansing | MI | 256 | B | L | 178.0 | 178.0 | 244.1° | 0.0 |
| ALC | East Lansing | MI | 256 | B | U | 178.0 | 178.0 | 244.1° | 0.0 |
| ALC | Toronto | ON | 256 | C1 | | 256.7 | 256.0 | 83.2° | 0.7 |
| ALC | Toronto | ON | 256 | C1 | | 256.7 | 256.0 | 83.2° | 0.7 |
| WATZFM | Alpena | MI | 257 | C2 | L | 183.4 | 106.0 | 333.9° | 77.4 |
| CJBC4F | London | ON | 257 | B | | 106.6 | 149.0 | 115.9° | 42.4 |
| ALC | Detroit | MI | 258 | B | U | 114.2 | 69.0 | 208.5° | 45.2 |
| WYCD | Detroit | MI | 258 | B | L | 114.5 | 69.0 | 206.7° | 45.5 |
| ALC | Midland | MI | 259 | C | U | 163.7 | 95.0 | 275.5° | 68.7 |
| WUGN | Midland | MI | 259 | C | L | 163.7 | 95.0 | 275.5° | 68.7 |

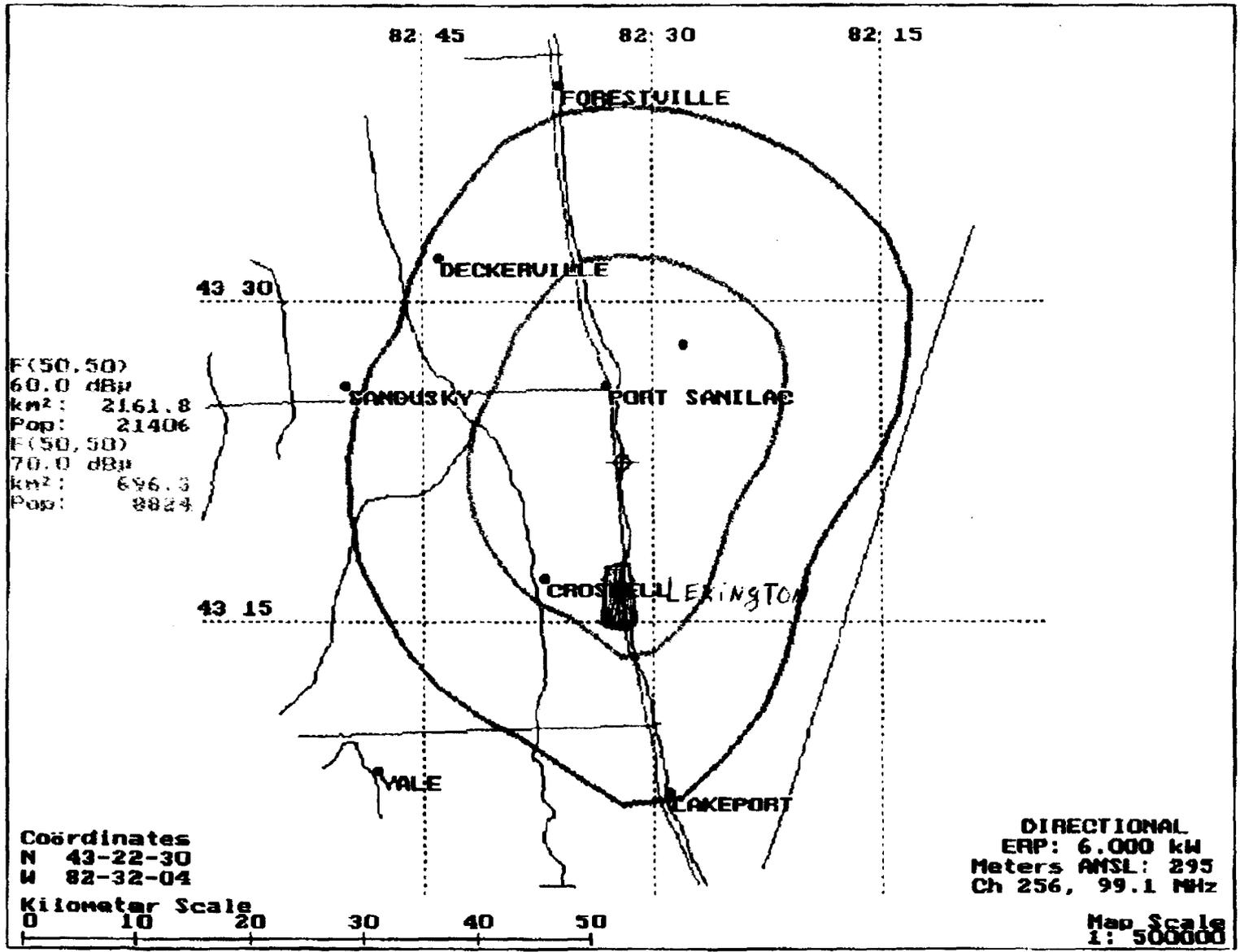
243.0 13.7 OK
 245.0 13.7 OK
 157.0 -30.8 ①

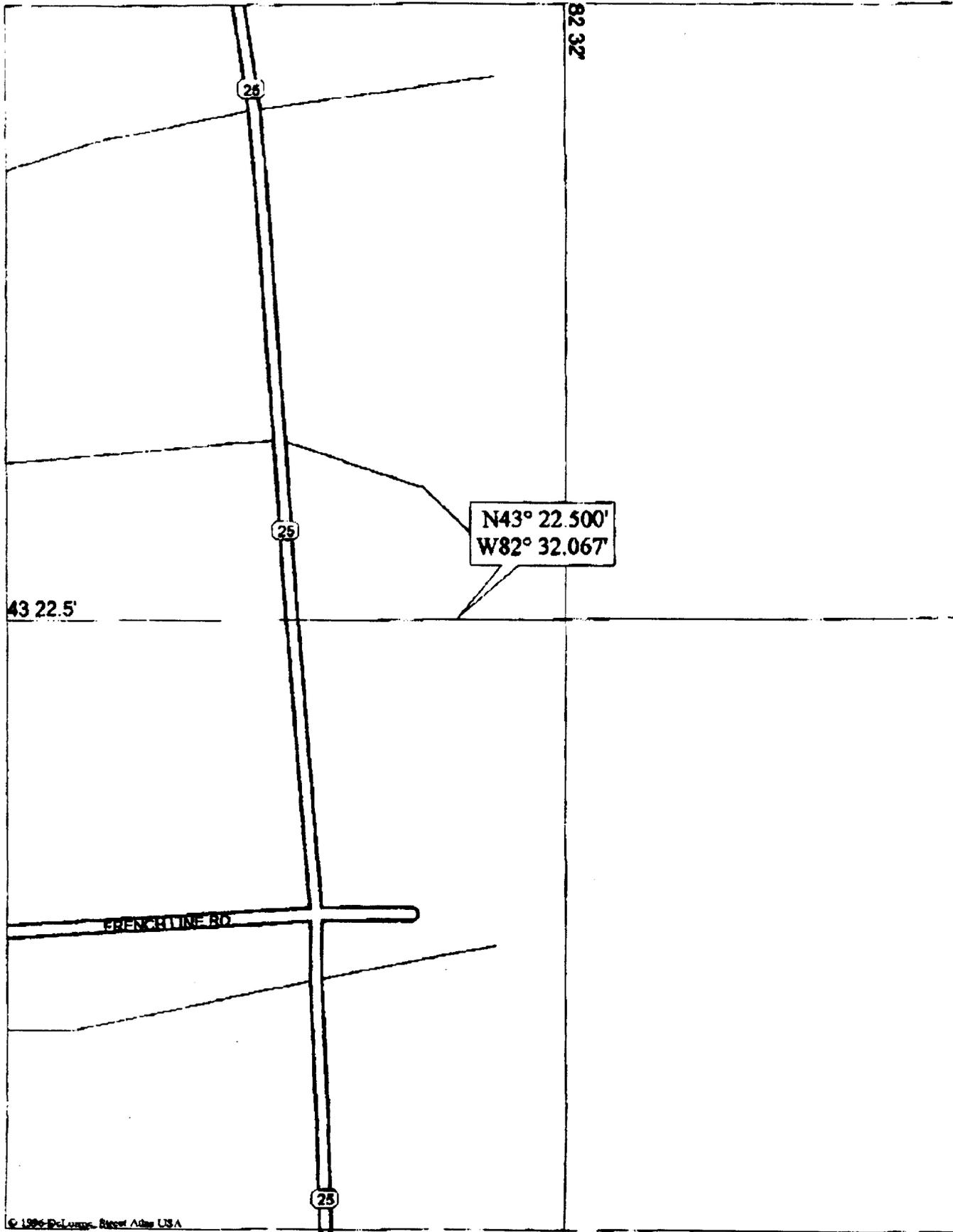
① SEE FOLLOWING MAP. ALLOCATION MUST BE SPECIALLY NEG.
 WITH CANADA. MEETS US-CANADIAN WORKING ARRANGEMENT.



LEXINGTON ①
 MEETS US - CAN WORKING ARRANGEMENT WITH DA.

70 dBu OF LEXINGTON CITY





LEXINGTON NOE SEARCH

Lex

MAPFM search of channels 201A6 to 220A6, at N. 43 22 30, W. 82 32 4:

| | | | | |
|---------------|----------|-------------------|----|-------------|
| Channel 201A6 | short by | 101.9 kilometers, | or | 63.3 miles. |
| Channel 202A6 | short by | 72.3 kilometers, | or | 44.9 miles. |
| Channel 203A6 | short by | 91.5 kilometers, | or | 56.8 miles. |
| Channel 204A6 | short by | 117.1 kilometers, | or | 72.8 miles. |
| Channel 205A6 | short by | 42.1 kilometers, | or | 26.2 miles. |
| Channel 206A6 | short by | 69.4 kilometers, | or | 43.1 miles. |
| Channel 207A6 | short by | 113.8 kilometers, | or | 70.7 miles. |
| Channel 208A6 | short by | 49.4 kilometers, | or | 30.7 miles. |
| Channel 209A6 | short by | 101.9 kilometers, | or | 63.3 miles. |
| Channel 210A6 | short by | 116.0 kilometers, | or | 72.1 miles. |
| Channel 211A6 | short by | 70.4 kilometers, | or | 43.8 miles. |
| Channel 212A6 | short by | 125.8 kilometers, | or | 78.2 miles. |
| Channel 213A6 | short by | 60.2 kilometers, | or | 37.4 miles. |
| Channel 214A6 | short by | 107.2 kilometers, | or | 66.6 miles. |
| Channel 215A6 | short by | 60.2 kilometers, | or | 37.4 miles. |
| Channel 216A6 | short by | 85.9 kilometers, | or | 53.4 miles. |
| Channel 217A6 | short by | 70.8 kilometers, | or | 44.0 miles. |
| Channel 218A6 | short by | 94.5 kilometers, | or | 58.7 miles. |
| Channel 219A6 | short by | 32.3 kilometers, | or | 20.1 miles. |
| Channel 220A6 | short by | 75.3 kilometers, | or | 46.8 miles. |

NONE FOUND.

CERTIFICATE OF SERVICE

I certify that on this 29th day of October 2001, I caused a copy of the foregoing "Comments and Counterproposal" to be mailed via first class postage prepaid mail to the following:

Charles Crawford
4553 Bordeaux Ave..
Dallas, Texas 75205

Edward Czelada

Edward Czelada